

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Karen Wells and Andre Locke as
co-trustees for the next of kin of
Amir Rahkare Locke, deceased,

Plaintiffs,

v.

Mark Hanneman, in his individual capacity
as a Minneapolis police officer, and the
City of Minneapolis,

Defendants.

Case No. 23-cv-273 (ECT/DLM)

**Joint Motion Striking
Pretrial Conference**

Whereas, this case involves claims by Plaintiffs against the above municipal Defendant, the City of Minneapolis (the “City”), and its employee, Mark Hanneman, individually, and in his capacity as an employee (collectively, “Defendants”);

Whereas, the Defendants brought a Motion for Judgment on the Pleadings, seeking to dismiss the entirety of this action;

Whereas, this Court issued an Order on July 8, 2024, denying the entirety of Defendants’ motion;

Whereas, on July 11, 2024, this Court issued an Order Setting Pretrial Conference (“July 11, 2024 Order”), setting a pretrial conference for August 12, 2024;

Whereas, the Defendants intend to file a notice of interlocutory appeal to the Eighth Circuit Court of Appeals on or before August 7, 2024, which Defendants assert would stay the entirety of these proceedings;

Whereas, the Defendants respectfully request that the Court cancel the pretrial conference set for August 12, 2024 and strike the July 11, 2024 Order and the requirements set forth therein;

Whereas, Plaintiffs do not waive and expressly preserve any jurisdictional argument they may raise in response to Defendants' appeal, but do not object to this request solely because they believe it makes sense from an efficiency standpoint;

Whereas, Plaintiffs' present intent is to file a motion to dismiss Defendants' appeal for a lack of jurisdiction;

Now therefore, the parties jointly move the Court to issue an Order as follows:

1. The Pretrial Conference in this matter set for August 12, 2024, is hereby stricken as are all deadlines set forth in this Court's July 11, 2024 Order Setting Pretrial Conference; and

2. The parties shall alert the Court within five business days upon the entry of any Order by the Eighth Circuit holding that jurisdiction remains or shall be returned to this Court.

STORMS DWORAK LLC

Dated: July 22, 2024

/s/ Jeffrey S. Storms

Jeffrey Storms (#0387240)

Ryan O. Vettleson, #0312915

Naomi E. H. Martin, #0402332

222 South 9th Street, Suite 470

Minneapolis, MN 55402

Telephone: (612) 455-7050

Facsimile: (612) 455-7051

E-mail: jeff@newmarkstorms.com

ryan@newmarkstorms.com

naomi@newmarkstorms.com

- and -

ROMANUCCI & BLANDIN

Antonio M. Romanucci (Admitted pro hac vice)
(Illinois ARDC No, 6190290)

Bhavani Raveendran (Admitted pro hac vice)
(Illinois ARDC No, 6309968)

Sam Harton (Admitted pro hac vice)
(Illinois ARDC No. 6342112)

321 North Clark St., Suite 900

Chicago, Illinois 60654

Phone: 312-458-1000

Fax: 312-458-1004

Email: aromanucci@rblaw.net

braveendran@rblaw.net

sharton@rblaw.net

- and -

BEN CRUMP LAW

Christopher M. O'Neal (*pro hac vice*)
(Florida Bar No. 0910201)

717 D Street N.W., Suite 310

Washington, D.C. 20004

E-mail: chris@bencrump.com

Attorneys for Plaintiffs

Dated: July 22, 2024

KRISTYN ANDERSON

City Attorney

By

/s Tracey N. Fussy

TRACEY N. FUSSY (311807)

SARA J. LATHROP (310232)

KRISTIN R. SARFF (388003)

Assistant City Attorneys

Minneapolis City Attorney's Office

350 South Fifth Street, Room 210

Minneapolis, MN 55415

(612) 673-2254

(612) 431-1826

(612) 673-3919

tracey.fussy@minneapolismn.gov

sara.lathrop@minneapolismn.gov

kristin.sarff@minneapolismn.gov

Attorneys for Defendants